

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 16-00321-15/21-CR-W-GAF
	)	
CHRISTINE LITTLE WOOD, and	)	
CARLOS BERRIOS,	)	
	)	
Defendants.	)	

**MEMORANDUM OF MATTERS DISCUSSED AND  
ACTION TAKEN AT PRETRIAL CONFERENCE**

**PENDING CHARGE:** On March 7, 2017, the Grand Jury returned a Second Superseding Indictment (Doc. #163) charging twenty-six defendants with various counts. Defendants Christine Little Wood and Carlos Berrios were charged with two counts: Count I, conspiracy to distribute one kilogram of heroin and 500 grams of methamphetamine, and Count II conspiracy to commit money laundering.

The following matters were discussed and action taken during the pretrial conference:

**TRIAL COUNSEL:**

Government: Bruce A. Rhoades  
Case Agent: none at the table  
Defense: Katrina Y. Robertson (Christine Little Wood)  
Cynthia Marie Dodge (Carlos Berrios)

**OUTSTANDING MOTIONS:**

11/08/2018	<a href="#">view629</a>	(Ex Parte) EX PARTE MOTION for Ex Parte Motion for Subpoena by Christine Little Wood. Suggestions in opposition/response due by 11/23/2018 unless otherwise directed by the court. (Robertson, Katrina) (Entered: 11/08/2018)
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**TRIAL WITNESSES:**

Government: with stipulations; 25 without stipulations  
Defendant Little Wood: 10-12 witnesses  
Defendant Berrios: 5-6, two of which are experts

Defendant Berrios's eyewitness expert, Dr. Brian Cutler, is coming in from either Canada or Connecticut and is on his last cancer treatments. Defense counsel was hoping to do his testimony via live video feed. The Government indicates that it does not have a report and has no idea what the expert will say. Therefore, the Government states that it cannot agree to live video feed at this time. The Government is not ruling out agreeing to testimony via live video feed. The Court indicates that the presiding judge will determine whether Dr. Cutler will appear via live video feed.

**TRIAL EXHIBITS**

Government: 45  
Defendant Little Wood: 20-30  
Defendant Berrios: approximately 45

**DEFENSES:** General denial as to both.

**POSSIBLE DISPOSITION:**

( X ) Definitely for trial; ( ) Possibly for trial; ( ) Likely a plea will be worked out

**TRIAL TIME: 10 days total**

Government's case including jury selection: 3 days  
Defendant Little Wood: 1-2 days  
Defendant Berrios: 3 days

**STIPULATIONS:** None at this time. The Government anticipates submitting some to the defendants in the near future.

**UNUSUAL QUESTIONS OF LAW:** None.

**FILING DEADLINES:**

**Witness and Exhibit List** (per the Scheduling and Trial Order, all Witness and Exhibit Lists were due thirty days prior to trial)

Government: Proposed Witness List filed 11/13/18  
Proposed Exhibit List filed 11/13/18  
Any updated Witness and Exhibit Lists **Due on or before November 20, 2018.**

Defendant Little Wood: (none filed) **Due on or before November 20, 2018**  
Defendant Berrios: (none filed) **Due on or before November 20, 2018.**

**Counsel are requested to list witnesses in alphabetical order on their witness list.**

**Exhibit Index, Voir Dire, Jury Instructions: Due by noon, Wednesday, November 28, 2018.**

**Please Note:** Jury instructions must comply with Local Rule 51.1

**Motion in Limine: Due on or before November 28, 2018**

**TRIAL SETTING:** Criminal jury trial docket set for December 3, 2018.

**Please note: The Government's witness has a conflict with the second week. The Government requests the first week. Neither defendant has an objection to the first week. Because the trial is potentially a two week trial the Court notes that it must be set on the first week.**

**There may be a 3<sup>rd</sup> Superseding Indictment.**

**IT IS SO ORDERED.**

*/s/ Lajuana M. Counts*

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Lajuana M. Counts

United States Magistrate Judge